James M. Barrett, OSB No. 011991
james.barrett@ogletree.com
Paul E. Cirner, OSB No. 191471
paul.cirner@ogletree.com
OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
The KOIN Center
222 SW Columbia Street, Suite 1500
Portland, OR 97201
Telephone: (503) 552 2140

Telephone: (503) 552 2140 Facsimile: (503) 224-4518 Attorneys for Defendants

NATIONAL FROZEN FOODS CORPORATION FRANK TIEGS, and BERNADETTE KINTZ

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

EUGENE DIVISION

PERLA A. TORRES,

Plaintiff.

v.

NATIONAL FROZEN FOODS CORPORATION, et al.,

Defendants.

Case No.: 6:20-cv-01680-MC

STIPULATED MOTION TO EXTEND TIME TO FILE FIRST AMENDED COMPLAINT

(Fed. R. Civ. P. 6(b))

Stipulated Motion

Pursuant to Federal Rule of Civil Procedure 6(b), Plaintiff and Defendants National Frozen Foods Corporation, Frank Tiegs, and Bernadette Kintz respectfully move for an extension of time, from June 4 to <u>June 14, 2021</u>, for Plaintiff to file a First Amended Complaint ("FAC") in response to the Court's Opinion and Order on Defendants' Motions to Dismiss (Dkt. #27).

Good cause exists for extending the FAC filing date, including the schedules of counsel and their clients and ongoing settlement discussions. The parties certify that this request is not made for the purposes of delay.

Phone: 503-552-2140 | Fax: 503-224-4518

SO STIPULATED this 4th day of June, 2021:

WILLIAMS WEYAND LAW, LLC

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

By: s/Simonne MG Weyand¹

Simonne MG Weyand, OSB No. 044936 simonne@williamsweyandlaw.com Attorneys for Plaintiff PERLA TORRES

By: s/James M. Barrett

James M. Barrett, OSB No. 011991
james.barrett@ogletreedeakins.com
Paul E. Cirner, OSB NO. 191471
Attorneys for Defendants NATIONAL
FROZEN FOODS CORPORATION,
FRANK TIEGS, and BERNADETTE
KINTZ

DAVID L. KRAMER, P.C.

By: s/David L. Kramer²

David L. Kramer, OSB No. 802904 david@kramerlaw.us Attorneys for Plaintiff PERLA TORRES

¹ Permission to file with electronic signature received by email on June 4, 2021.

² Permission to file with electronic signature received by email on June 4, 2021.

^{2 -} STIPULATED MOTION TO EXTEND TIME TO FILE FIRST AMENDED COMPLAINT

CERTIFICATE OF SERVICE

I hereby certify that on June 4, 2021, I served the foregoing STIPULATED MOTION TO

EXTEND TIME TO FILE FIRST AMENDED COMPLAINT on:

Simonne MG Weyand
simonne@williamsweyandlaw.com
WILLIAMS WEYAND LAW, LLC
P.O. Box 3698
Salem, OR 97302
Tel: (503) 212-0050

Fax: (503) 391-4269

Of Attorneys for Plaintiff

David L. Kramer david@kramerlaw.us DAVID L. KRAMER, P.C. 3265 Liberty Road S. Salem, OR 97302 Tel: (503) 212-0050 Fax: (503) 391-4269

Of Attorneys for Plaintiff

Ryan S. Gibson

ryan@rsgibsonlaw.com

RYAN S. GIBSON LAW LLC

1050 SW 6th Ave., Suite 1100

Portland, OR 97204

Tel: (503) 477-7789

Of Attorneys for Defendant Lo

Of Attorneys for Defendant Larry Hargreaves

- by **electronic** means through the Court's Case Management/Electronic Case File system, which will send automatic notification of filing to each person listed above.
- by **mailing** a true and correct copy to the last known address of each person listed above. It was contained in a sealed envelope, with postage paid, addressed as stated above, and deposited with the U.S. Postal Service in Portland, Oregon.
- by causing a true and correct copy to be **hand-delivered** to the last known address of each person listed above. It was contained in a sealed envelope and addressed as stated above.
- by **e-mailing** a true and correct copy to the last known email address of each person listed above per Email Service Agreement.

Dated: June 4, 2021.

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

By: s/ Kai Jones
Kai Jones
503-552-2140
kai.jones@ogletreedeakins.com

47105333.1

Phone: 503-552-2140 | Fax: 503-224-4518